1		IN THE UNITED STATES DISTRICT COURT					
2	FOR TH	HE DISTRICT OF ARIZONA					
3	IN RE BARD IVC FILTERS	No. MD-15-02641-PHX-DGC					
4	PRODUCTS LIABILITY LITIGATI	ON					
5		SECOND AMENDED MASTER SHORT FORM COMPLAINT FOR					
6		DAMAGES FOR INDIVIDUAL					
7		CLAIMS AND DEMAND FOR JURY TRIAL - (AMENDED)					
8							
9	Plaintiff(s) named below, for t	heir Complaint against Defendants named below, incorporate					
10 11	the Master Complaint for Damages in MDL 2641 by reference (Doc. 364). Plaintiff(s) further show						
12							
13							
14	1. Plaintiff/Deceased Par	rty:					
15	Danus Bryson Chrisle	<u>y</u>					
16	2. Spousal Plaintiff/Dece	eased Party's spouse or other party making loss of consortium					
17	claim:						
18	Patricia Mclellan Ch	riclay					
19		•					
20	3. Other Plaintiff and cap	pacity (i.e., administrator, executor, guardian, conservator):					
21	<u>N/A</u>						
22	4. Plaintiff's/Deceased P	Party's state(s) [if more than one Plaintiff] of residence at the					
23	time of implant:						
24	-						
25	South Carolina						
26	///						
2728	///						
∠0							
	II						

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28

1	10.	Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim		
2		(Check applicable Inferior Vena Cava Filter(s)):		
3		(Check applicable interior vena Cava i inter(s)).		
4			Recovery® V	Vena Cava Filter
5		\boxtimes	COR M. C	F'1.
6			G2® Vena C	ava Filter
7			☐ G2 [®] Express (G2 [®] X) Vena Cava Filter	
8			1	
9			Eclipse® Ver	na Cava Filter
10		_		
11			Meridian® V	ena Cava Filter
12			Denali® Ven	na Cava Filter
13			Denum ven	au Cuvu i iitoi
14 15			Other:	
16	4.4			
17	11.	Date	of Implantation	n as to each product:
18		Septe	ember 18, 2006	j
19				
20	12.	Coun	ts in the Maste	er Complaint brought by Plaintiff(s):
21				
22			Count I:	Strict Products Liability - Manufacturing Defect
23		\boxtimes	Count II:	Strict Products Liability - Information Defect (Failure to
24				W.
25				Warn)
26			Count III:	Strict Products Liability - Design Defect
27		×	Count IV:	Nagliganca Dagign
28		KZI	Count IV:	Negligence - Design

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1			Count V:	Negligence - Manufacture
2			~	
3			Count VI:	Negligence - Failure to Recall/Retrofit
4 5			Count VII:	Negligence - Failure to Warn
6			Count VIII:	Negligent Misrepresentation
7			Count viii.	regingent imprepresentation
8			Count IX:	Negligence Per Se
9			Count X:	Breach of Express Warranty
10		×	Count XI:	Breach of Implied Warranty
11 12			Count AI.	breach of Implied Warranty
13			Count XII:	Fraudulent Misrepresentation
14			Count XIII:	Fraudulent Concealment
15		⊠	Count VIV.	Wielstiene of Applicable Floride Law Duckibities Consumer
16		Δ	Count XIV:	Violations of Applicable Florida Law Prohibiting Consumer
17				Fraud and Unfair and Deceptive Trade Practices
18 19		⊠	Count XV:	Loss of Consortium
20			Count XVI:	Wrongful Death
21				
22			Count XVII:	Survival
23	///			
2425	///			
26	///			
27			Punitive Dama	ages
28				
				4

1			Other(s):	(please state the facts
2				
3				supporting this Count in the space immediately below)
4				
5				
6				
7				
8	13.	Jury	Trial demanded	for all issues so triable?
9		\boxtimes	Yes	
10			No	
11				
12				Respectfully submitted, THE NATIONS LAW FIRM
13				
14				/s/ Howard L. Nations
				Howard L. Nations Texas Bar No. 14823000
15				3131 Briarpark Dr.
16				Suite 208
17				Houston, TX 77042
18				ATTORNEYS FOR PLAINTIFF(S)
19	Т 1	1	4:C 414 41-1-	24th day of Falamana 2017. I also the size like the size is the day
20				s 24 th day of February, 2017, I electronically transmitted the ffice using the CM/ECF System for filing and transmittal of a
21	Notice of Ele			
22				/s/ Howard L. Nations
23				Howard L. Nations
24				
25				
26				
27				
28				
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